

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WALTER SLOAN,)
)
Plaintiff,) No. 07 C 2650
)
vs.) Judge Darrah
) Magistrate Judge Mason
VILLAGE OF HICKORY HILLS, et al.,)
)
Defendants.)

**MOTION FOR LEAVE TO FILE ADDITIONAL
APPEARANCE AND TO FILE INSTANTER
PLAINTIFF'S FIRST AMENDED THE COMPLAINT**

Plaintiff, through counsel, moves this Honorable Court to grant leave to attorneys Lawrence V. Jackowiak, Louis J. Meyer and Daniel P. Kiss to file additional appearances, and grant leave to file *instanter* the attached First Amended Complaint. In support thereof, Plaintiff states as follows:

1. This is a § 1983 action where Plaintiff alleges excessive force against police officers from the Hickory Hills Police Department arising from an incident that occurred on December 16, 2005.
2. On December 14, 2007, Plaintiff filed the instant four-count Complaint.
3. On May 22, 2008, Defendants' filed a motion to dismiss Counts I, II, and IV.
4. Counts I and II are state law claims that are barred by the statute of limitations.
5. Count IV is a supervisor liability claim against ALAN VODICKA, the Chief of Police for the Hickory Hills Police Department, for failure to train.
6. On June 26, 2008, Plaintiff filed a response to Defendants' motion to dismiss.
7. On July 10, 2008, Defendants filed a reply.
8. This Honorable court has not yet ruled on the motion.
9. Plaintiff has recently retained the law firm of the Law Offices of Lawrence V. Jackowiak to assist in the prosecution of this case, and requests that attorneys Lawrence V. Jackowiak, Louis J. Meyer, and Daniel P. Kiss be allowed to file their appearance on his behalf.
10. Current Plaintiff's counsel, Marianne Hannigan, will remain counsel for Plaintiff

as well.

11. Based upon the Defendants' motion to dismiss, Plaintiff has prepared the attached First Amended Complaint, which withdraws the state law claims that Defendants sought to dismiss, and it also clarifies the supervisor liability claim.

12. This motion is not brought for delay.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an order granting leave for attorneys in the firm of Law Offices of Lawrence V. Jackowiak to file appearances in this case, and grant leave to file the attached First Amended Complaint, and deny the pending motion to dismiss as moot.

Respectfully submitted,

/s/ Lawrence V. Jackowiak
Counsel for the Plaintiff

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